

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

IN RE:
JUAN JOSE RIVERA

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CASE NUMBER: 16-70469

CHAPTER 13

**MOTION TO SHORTEN RESPONSE TIME ON
EXPEDITED MOTION TO WITHDRAW AS COUNSEL**

TO THE HONORABLE JUDGE OF SAID COURT:

Roberto A. Guerrero, attorney for Debtor, JUAN JOSE RIVERA, hereby files this Motion to Shorten Response Time on the Expedited Motion to Withdraw as Counsel, and in support would show the following:

1. Concurrent with the filing of this motion, Counsel for Debtors has filed the above motion. The Debtor's Counsel requests that the court shorten the response time on said Motion from twenty-one (21) days to four (4) days from the date of service; any objection to the motion shall be filed no later than 5:00 p.m. on December 13, 2016.

2. Debtor's counsel wishes to withdraw from representing the Debtors for good cause. Debtor has been advised that certain matters need to be cured, both orally and written. Debtor has not contacted the law office, and does not seem too concerned about his obligations with respect to his bankruptcy proceeding.

WHEREFORE PREMISES CONSIDERED, Roberto A. Guerrero, attorney for Debtor, JUAN JOSE RIVERA, pray the Court enter an Order shortening the response time on the motion to four (4) days, and that the Court grant any and all further relief to which he may show himself justly entitled.

Respectfully submitted,

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By: /S/ Roberto A. Guerrero
Roberto A. Guerrero
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Attorney for Juan Jose Rivera

CERTIFICATE OF SERVICE

This is to certify that on December 9, 2016, a true and correct copy of the above and foregoing document was served on all the following:

Cindy Boudloche Chapter 13 Trustee 555 N Carancahua, Ste 600 Corpus Christi, TX 78401-0823	Diane W. Sanders Linebarger Goggan Blair & Sampson, LLP PO Box 17428 Austin, TX 78760-7428
US Trustee 606 N Carancahua Corpus Christi, TX 78401	Elizabeth Mason 300 E. 8 th Street MS5026 AUS Austin, TX 78701
VIA CERTIFIED MAIL # 7016 2140 0000 4795 0963 Mr. Juan Jose Rivera 2409 S. Bridge Street Weslaco, TX 78596	Selected Portfolio Servicing, Inc. c/o Shapiro Schwartz, LLP 13105 Northwest Freeway, Suite 1200 Houston, TX 77040

/S/ Roberto A. Guerrero
Roberto A. Guerrero